

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE ROYAL BANK OF SCOTLAND  
GROUP PLC SECURITIES LITIGATION

09 Civ. 300 (DAB)

LIGHTHOUSE FINANCIAL GROUP,  
Individually and On Behalf of All Others  
Similarly Situated,

11 Civ. 398 (GBD)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

ETHAN GOLD, Individually and On Behalf  
of All Others Similarly Situated,

11 Civ. 1162 (NRB)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

**LIGHTHOUSE FINANCIAL GROUP LLC'S NOTICE OF MOTION  
TO CONSOLIDATE PURSUANT TO FED. R. CIV. P. 42(a)**

**SADIS & GOLDBERG LLP**

Charles H. Dufresne, Jr. (CD-4864)  
551 Fifth Avenue, 21st Floor  
New York, New York 10176  
Tel: 212-573-6660

**GARDY & NOTIS, LLP**

Mark C. Gardy  
James S. Notis  
Kira German  
560 Sylvan Avenue, Suite 3085  
Englewood Cliffs, New Jersey 07632  
Tel: 201-567-7337

*Counsel for Plaintiff-Movant Lighthouse Financial Group LLC*

PLEASE TAKE NOTICE that plaintiff Lighthouse Financial Group LLC (“Lighthouse”), by its counsel, will hereby move this Court on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, New York 10007-1312, for an Order, pursuant to Fed. R. Civ. P. 42(a), (i) consolidating *Lighthouse Financial Group LLC v. Royal Bank of Scotland Group PLC et. al.*, 11 Civ. 398 (GBD) with *In Re Royal Bank of Scotland Group PLC Securities Litigation*, 09 Civ. 300 (DAB) and *Gold v. Royal Bank of Scotland Group PLC*, 11 Civ. 1162 (NRB); and (ii) granting Lighthouse such other and further relief as the Court deems appropriate. In support of this Motion, Lighthouse submits herewith a supporting Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that counsel for plaintiff-movant Lighthouse hereby requests oral argument.

Dated: March 4, 2011

Respectfully submitted,

**SADIS & GOLDBERG LLP**

By: s/ Charles H. Dufresne, Jr.  
Charles H. Dufresne, Jr. (CD-4864)  
551 Fifth Avenue, 21st Floor  
New York, New York 10176  
Tel: 212-573-6660  
Fax: 212-573-6661

**GARDY & NOTIS, LLP**

Mark C. Gardy  
James S. Notis  
Kira German  
560 Sylvan Avenue, Suite 3085  
Englewood Cliffs, New Jersey 07632  
Tel: 201-567-7337  
Fax: 201-567-7377

*Counsel for Plaintiff-Movant  
Lighthouse Financial Group LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 4, 2011

**SADIS & GOLDBERG LLP**

By: s/ Charles H. Dufresne , Jr.  
Charles H. Dufresne, Jr. (CD-4864)  
551 Fifth Avenue, 21st Floor  
New York, New York 10176  
Tel: 212-573-6660  
Fax: 212-573-6661

**GARDY & NOTIS, LLP**  
Mark C. Gardy  
James S. Notis  
Kira German  
560 Sylvan Avenue, Suite 3085  
Englewood Cliffs, New Jersey 07632  
Tel: 201-567-7337  
Fax: 201-567-7377

*Attorneys for Movant Lighthouse  
Financial Group*